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14
15 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

16
17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC
COMPANY,**

21 **Debtors.**

22
23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric Company
25 Affects both Debtors

26 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION RE: THE PRODUCTION OF
THE 2015 BUTTE FIRE SETTLEMENT
INFORMATION**

[No Hearing Requested]

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 The parties, by and through the Tort Claimants Committee (the “TCC”) and Pacific Gas
3 and Electric Company and PG&E Corporation (collectively, the “**Debtors**”), hereby reach the
4 following stipulation as to the Debtors’ production of settlement information related to the 2015
5 Butte Fire.

6 **STIPULATION**

7 The Debtors and the TCC agree to the Order re: the Production of the 2015 Butte Fire
8 Settlement Information, filed concurrently with this stipulation. Specifically, the parties agree as
9 follows:

10 1. The Debtors shall redact names, addresses and any other personally identifying
11 information associated with individual claims from the Butte Settlement Documents prior to their
12 production.

13 2. To the extent that any documents that the Debtors produce as part of the Butte
14 Settlement Documents are subject to mediation confidentiality under Cal. Evid. C. § 1119, the
15 Debtors’ production of such documents in these Chapter 11 Cases shall not constitute a violation
16 of any provision governing mediation confidentiality, including Cal. Evid. C. §§ 1115-28.

17 3. To the extent that any documents that the Debtors produce as part of the Butte
18 Settlement Documents are subject to work product protection or attorney-client privilege under
19 state or federal law, the Debtors’ production of such documents in these Chapter 11 Cases shall
20 not constitute a waiver of privilege or work product protection over any other document, or any
21 kind of subject matter waiver. Nothing in this Order shall preclude the TCC from arguing that any
22 work product protection, attorney-client privilege or other protection asserted by Debtors over the
23 Butte Settlement Documents has already been waived by the Debtors. Further, nothing in this
24 order precludes the Debtors from disagreeing with and opposing such argument.

25 4. This Court shall retain jurisdiction to hear and determine all matters arising from
26 or related to the implementation, interpretation or enforcement of this Order.

1 So stipulated:

2 Dated: August 29, 2019

CRAVATH, SWAINE & MOORE LLP

4 */s/ Kevin J. Orsini*

5 KEVIN J. ORSINI
6 Attorney for the Debtors

7

8 Dated: August 29, 2019

BAKER & HOSTETLER LLP

10 */s/ Kimberly S. Morris*

11 KIMBERLY S. MORRIS
12 Attorney for the Tort Claimants' Committee

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